

1 DANIEL A. MANN, 15594
2 MARK A. DOMBROFF (PHV Admitted)
3 JAMES A. EASTWOOD (PHV Admitted)
4 **FOX ROTHSCHILD LLP**
5 One Summerlin
6 1980 Festival Plaza Dr., Suite 700
7 Las Vegas, Nevada 89135
8 And
9 2020 K Street, N.W.
10 Suite 500
11 Washington, DC 20006
12 Telephone: 702.699.5936
13 202.461.3100
14 Fax No.: 702.597.5503
15 dmann@foxrothschild.com
16 mdombroff@foxrothschild.com
17 jeastwood@foxrothschild.com

18 *Attorneys for Defendants*

19
20
21 UNITED STATES DISTRICT COURT
22
23 DISTRICT OF NEVADA

24 JOHN EDWARD CLARK, individually,
25 ANGELIQUA CHENEE GROCE,
26 individually, and DANNESHA
27 KIRKWOOD,
28 individually,

Plaintiff,

vs.

SUN COUNTRY HOLDINGS, INC., a
foreign corporation; DOE INDIVIDUALS I
through X, inclusive; and ROE ENTITIES I
through X, inclusive,

Defendants.

Case No. 2:24-cv-00379-CDS-BNW

**STIPULATION TO EXTEND TIME
FOR PARTIES TO SERVE
DISCLOSURE OF EXPERTS AND
EXPERT REPORTS**

**Current deadline: June 24, 2024, for
Initial Expert and July 22, 2024, for
Rebuttal Expert**
**New deadline: August 23, 2024, for Initial
Expert and September 20, 2024, for
Rebuttal Expert**

24 Plaintiffs, JOHN EDWARD CLARK, individually, ANGELIQUA CHENEE GROCE,
25 individually, and DANNESHA KIRKWOOD, individually (“Plaintiffs”), by and through their
26 counsel of record, MICHAEL L. SHIRTS, ESQ., of DIMOPOULOS INJURY LAW; Defendant
27 SUN COUNTRY AIRLINES HOLDINGS, INC. (“Sun Country”), by and through its counsel,
28

1 DANIEL A. MANN, ESQ., MARK A. DOMBROFF, ESQ., and JAMES A. EASTWOOD,
2 ESQ., of FOX ROTHSCHILD LLP, hereby stipulate to extend the deadline for Parties to serve
3 their disclosure of experts and expert reports for a period of sixty (60) days, up to and
4 including **August 23, 2024**.
5

6 1. On April 4, 2024, the Court issued an Order setting the discovery schedule.
7

8 2. Per the Court's Order, the deadline for Parties to serve disclosure of experts and
9 expert reports was by June 24, 2024.
10

11 3. The parties are looking to mediate this matter and require this deadline to be
12 extended to provide ample time to schedule a date to avoid unnecessary litigation costs before
13 mediation.
14

15 4. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
16 serve their disclosure of experts and expert reports for a period of sixty (60) days, up to and
17 including **August 23, 2024**.
18

19 5. This deadline extension would require the deadline for rebuttal expert disclosures
20 to be extended as well to avoid the deadline to be before the initial disclosures of expert witnesses.
21

22 6. Accordingly, the Parties agree and stipulate to extend the deadline for Parties to
23 serve their disclosure of rebuttal experts and expert reports for a period of sixty (60) days,
24 **September 20, 2024**, which is 29 days after disclosure of experts since the typical 30 days falls
25 on a Saturday.
26

27 8. The Parties respectfully request that the Court enter an Order consistent with the
28 Parties' Stipulation as detailed herein.
29

1 DATED this 3rd day of June, 2024
2

3 **FOX ROTHSCHILD LLP**

4 /s/ Daniel A. Mann

5 DANIEL A. MANN, 15594
6 MARK A. DOMBROFF (PHV Admitted)
7 JAMES A. EASTWOOD (PHV Admitted)

8 **FOX ROTHSCHILD LLP**

9 One Summerlin
10 1980 Festival Plaza Dr., Suite 700
11 Las Vegas, Nevada 89135

12 And
13 2020 K Street, N.W.
14 Suite 500

15 Washington, DC 20006
16 dmann@foxrothschild.com
17 mdombroff@foxrothschild.com
jeastwood@foxrothschild.com
18 *Attorneys for Defendants*

19 **DIMOPOULOS INJURY LAW**

20 /s/ Michael L. Shirts

21 MICHAEL L. SHIRTS, ESQ.
22 Nevada Bar No. 10223
23 6671 South Las Vegas Boulevard, Suite 275
24 Las Vegas, Nevada 89119
25 ms@stevedimopoulos.com
26 *Attorney for Plaintiffs*

1 DANIEL A. MANN, 15594
2 MARK A. DOMBROFF (PHV Admitted)
3 JAMES A. EASTWOOD (PHV Admitted)
4 **FOX ROTHSCHILD LLP**
5 One Summerlin
6 1980 Festival Plaza Dr., Suite 700
7 Las Vegas, Nevada 89135
8 And
9 2020 K Street, N.W.
Suite 500
Washington, DC 20006
Telephone: 702.699.5936
202.461.3100
Fax No.: 702.597.5503
dmann@foxrothschild.com
mdombroff@foxrothschild.com
jeastwood@foxrothschild.com

10 | *Attorneys for Defendants*

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 JOHN EDWARD CLARK, individually,
14 ANGELIQUA CHENEE GROCE,
15 individually, and DANNESHA
KIRKWOOD,
individually,
Plaintiff

Case No. 2:24-cv-00379-CDS-BNW

**[PROPOSED] ORDER ON
STIPULATION TO EXTEND TIME FOR
PARTIES TO SERVE DISCLOSURE OF
EXPERTS AND EXPERT REPORTS**

Current deadline: June 24, 2024, for Initial Expert and July 22, 2024, for Rebuttal Expert

Expert
New deadline: August 23, 2024, for Initial
Expert and September 20, 2024, for
Rebuttal Expert

23 | //

24 | //

25 | //

26 | //

27 | //

159321018.1

The Court, having considered the Parties' Stipulation to Extend Time for Parties to Serve Disclosures of Experts and Export Reports, and good cause appearing, hereby ORDERS that Parties shall serve their disclosures of initial expert witnesses and initial expert reports on or before **August 23, 2024**, and Parties shall serve their disclosures of rebuttal expert witnesses and rebuttal expert reports on or before **September 20, 2024**.

IT IS SO ORDERED.

Dated this 4 day of June, 2024.

By Brenda Weksler
Hon. Brenda Weksler
Magistrate Judge